

EXHIBIT 2

EXHIBIT A

DOCUMENT SCHEDULE

I. Definitions

1. “Document” shall refer to all writings of every kind, including originals and all non-identical duplicates or copies thereof, including but not limited to: contracts, agreements, purchase orders, correspondence, electronic mail, including electronic mail stored on any individual’s personal computer or on electronic back-up storage media, transcripts of testimonies, letters, memoranda, notes, reports, papers, files, books or records.

2. “Relating to” shall mean relate to, refer to, reflect upon, discuss, concern, mention, analyze, document, constitute, embody or evidence, in whole or in part, the subject matter of the particular request.

3. “Identify” when used with reference to a document, shall mean to describe the document fully, including but not limited to, identifying the type of document (e.g., letter, facsimile, chart, etc.), its title (if any), date the document was prepared, author(s), addressee(s), recipient(s), number of pages, the location and custodian of each copy to the extent known, the substance of the contents thereof, and any other identifying information.

4. “Identify” when used with reference to an act, event, transaction, relationship, thing, condition, or occurrence shall mean to provide a full description of such act, event, transaction, communication, relationship, thing, condition, or occurrence, including a complete description of the underlying facts, the substance of any communication, exchange or conversation, date(s), place(s), person(s) involved, person(s) having knowledge, and pertinent documents.

5. “Identify” when used with reference to a natural person, shall include his or her

full name, present or last known home and business address and telephone numbers, and employer and business position(s) and affiliation(s) at the time(s) to which the question relates.

6. “Identify” when used with reference to a judicial person, a company or other business entity, shall include its full name, present or last known address and its administrator, president or chief executive officer at the time to which the question relates.

7. “Communicate” or “Communication” shall refer to every manner or means of disclosure, transfer or exchange, and every disclosure, transfer or exchange of information, whether made or accomplished orally or by document, whether face to face, by telephone, mail, electronic mail, voicemail, telex, facsimile, personal delivery or otherwise.

8. “Person” or “Individual” shall be deemed to include natural persons, partnerships, joint ventures, firms, associations, proprietorships, corporations, or other such entities, subsidiaries, agents, employees, consultants and representatives thereof.

II. Document Requests

The documents and/or information that you are requested to produce are as follows:

1. All documents and/or information relating to the identity of the person who used the Instagram screen name “cuckoobob2” to publish pictures, statements and comments on Instagram (i.e. <https://www.instagram.com/cuckoobob2>) between January 1, 2015 to the present day, including, but not limited to, documents and/or information identifying this user’s first and last name, email address(es), physical address(es), telephone and/or mobile phone number(s), birthdate(s), Internet Protocol (“IP”) address(es), IP log records, device identifiers (which identify the user’s mobile device), and any other identifying information.
2. All documents and/or information relating to the identity of the person who used the Instagram screen name “cuckoobob2.inc” to publish pictures, statements and comments on Instagram (i.e. <https://www.instagram.com/cuckoobob2.inc>) between January 1, 2015 to the present day, including, but not limited to, documents and/or information identifying this user’s first and last name, email address(es), physical address(es), telephone and/or mobile phone number(s), birthdate(s), Internet Protocol (“IP”) address(es), IP log records, device identifiers (which identify the user’s mobile device), and any other identifying information.

3. All documents and/or information relating to the identity of the person who used the Instagram screen name “cuckoobob3” to publish pictures, statements and comments on Instagram (i.e. <https://www.instagram.com/cuckoobob3>) between January 1, 2015 to the present day, including, but not limited to, documents and/or information identifying this user’s first and last name, email address(es), physical address(es), telephone and/or mobile phone number(s), birthdate(s), Internet Protocol (“IP”) address(es), IP log records, device identifiers (which identify the user’s mobile device), and any other identifying information.
4. All documents and/or information relating to the identity of the person who used the Instagram screen name “cuckoobob4” to publish pictures, statements and comments on Instagram (i.e. <https://www.instagram.com/cuckoobob4>) between January 1, 2015 to the present day, including, but not limited to, documents and/or information identifying this user’s first and last name, email address(es), physical address(es), telephone and/or mobile phone number(s), birthdate(s), Internet Protocol (“IP”) address(es), IP log records, device identifiers (which identify the user’s mobile device), and any other identifying information.
5. All documents and/or information relating to the identity of the person who used the Instagram screen name “cuckoobob218” to publish pictures, statements and comments on Instagram (i.e. <https://www.instagram.com/cuckoobob218>) between January 1, 2015 to the present day, including, but not limited to, documents and/or information identifying this user’s first and last name, email address(es), physical address(es), telephone and/or mobile phone number(s), birthdate(s), Internet Protocol (“IP”) address(es), IP log records, device identifiers (which identify the user’s mobile device), and any other identifying information.
6. All documents and/or information relating to the identity of the person who used the Instagram screen name “cuchenbob218” to publish pictures, statements and comments on Instagram (i.e. <https://www.instagram.com/cuchenbob218>) between January 1, 2015 to the present day, including, but not limited to, documents and/or information identifying this user’s first and last name, email address(es), physical address(es), telephone and/or mobile phone number(s), birthdate(s), Internet Protocol (“IP”) address(es), IP log records, device identifiers (which identify the user’s mobile device), and any other identifying information.